

Monsanto

LAW DEPARTMENT

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

November 15, 1994

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SUPERFUND PROGRAM
MANAGEMENT BRANCH

Marsha A. Adams
5 HMS-5J, Responsible Party Search Section
U.S. Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: Sauget Area I, Sauget, Illinois


Dear Ms. Adams:

As discussed in our telephone conversation yesterday on the matter referenced above, your letter dated October 27, 1994 requests substantiation of the confidential business information (CBI) claim which we had previously made. Such substantiation was to be supplied within 15 days of our receipt of your letter. However, we are presently copying a large number of documents recently selected by Thomas J. Martin, Assistant Regional Counsel, United States Environmental Protection Agency (EPA), Region V, from the relevant documents as produced by Monsanto in the course of Cerro Copper Products Company v. Monsanto Company and Monsanto Chemical Company, Docket No. 92-CV-204-WDS (USDC S.D. IL).

Monsanto will also be asserting a business confidentiality claim covering the information contained in these documents pursuant to 40 CFR Part 2, Subpart B. Given the volume of information as sought by EPA in this matter and the similarity of the CBI issues for both the material previously provided and the documents to be provided from Cerro Copper Products Company v. Monsanto Company and Monsanto Chemical Company, we requested, and you orally agreed to, a 30-day extension of time to December 15, 1994 to provide the appropriate substantiation. Such substantiation would address both the documents previously provided, as well as those to be provided between now and then.

Please advise if you have any questions concerning Monsanto's position in this regard.

Very truly yours,


Stephen P. Krchma
Environmental Counsel

cc: Thomas J. Martin
Assistant Regional Counsel
U.S. EPA, Region V